

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

UNITED STATES OF AMERICA)
)
V.) **CASE NO: 1:06-CR-124-WHA**
)
ROBERT REYNOLDS)

UNOPPOSED MOTION TO CONTINUE SENTENCING

COMES NOW the Defendant, Robert Reynolds (“Mr. Reynolds”), by undersigned counsel, Christine A. Freeman, and respectfully moves that the sentencing hearing, now set in this matter for June 27, 2007, be continued to a later date.

In support of this motion, the Defendant would show the following:

1. Mr. Reynolds has been diagnosed with lymphoma and has begun chemotherapy for this disease. The treatment is working well regarding this disease. Unfortunately, the treatments are making Mr. Reynolds very weak, to the extent he can barely get around.

2. Mr. Reynolds is scheduled for additional chemotherapy treatments. Therefore, undersigned counsel is asking for more time before he appears in District Court regarding his sentencing hearing.

3. Counsel for the prosecution has authorized undersigned counsel to state that the prosecution does not oppose this motion.

4. Mr. Reynolds is under the care of Dr. Brown of Dothan, Alabama at 334-793-4804.

A letter from Dr. Brown is being simultaneously submitted to the Court, in support of this Motion.

WHEREFORE, defendant respectfully requests that this Motion be granted.

Respectfully submitted,

s/Christine A. Freeman
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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:
Susan Redmond, Esq., Assistant United States Attorneys, One Court Square, Montgomery, AL 36104.

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